UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

GEORGE GUINDON, et al	:	
VS.	:	C.A. NO. 03-335L (Adopting 3rd Amended Master Complaint in C.A. No. 04-312L)
AMERICAN FOAM CORPORATION	:	

ANSWER OF DEFENDANT, SURPLEX UNDERWRITERS, INC., TO PLAINTIFFS' NOTICE OF ADOPTION OF THIRD AMENDED MASTER COMPLAINT

Plaintiffs have adopted the Third Amended Master Complaint filed in Albert L. Gray, Administrator, et al v. Jeffrey Derderian, et al, C.A. No. 04-312-L (the "Gray Case"). On March 27th, 2006, Defendant, Surplex Underwriters, Inc. Filed its Answer to the Third Amended Master Amended Complaint in the Gray Case. This Defendant adopts and incorporates herein said Answer, including its affirmative defenses and jury trial demand.

WHEREFORE, the Defendant, Surplex Underwriters, Inc., demands judgment dismissing the Plaintiffs claims with prejudice and that it be awarded costs and such other and further relief as the Court deems just.

Defendant,
Surplex Underwriters, Inc.,
By and Through Its Attorney,

Bennett R. Gallo, Esq. (#1308)
NOLAN, DAILEY, GALLO, ROTHEMICH & BRUNERO, LTD.
1070 Main Street
Coventry, RI 02816
401-828-5800 - telephone
401-823-3230 - facsimile
brg@ndgrb.com

CERTIFICATION

I, the undersigned, do hereby certify on this 10th day of July, 2006, that an exact copy of the within Answer was electronically mailed to the individuals list in the attached Exhibit "A":

EXHIBIT A

Karen A. Alegria, Esq.	Karen@Briancunha.com
Thomas C. Angelone, Esq.	angelonelaw@aol.com
Stephen T. Armato	stationlitigation@cetcap.com
Charles Babcock, Esq.	cbabcock@jw.com
John P. Barylick, Esq.	jpb@wistbar.com
Thomas R. Bender, Esq.	stationfire@hansoncurran.com
C. Russell Bengston, Esq.	rbengtson@ckmlaw.com
James A. Bigos, Esq.	jim@b-plaw.com
Kevin F. Bowen, Esq.	kbowen@bbglaw.us
Stephen E. Breggia, Esq.	sbreggia@bbglaw.us
Joseph B. Burns, Esq.	jburns@rms-law.com
Mark D.Cahill, Esq.	mcahill@choate.com
Lawrence J. Cappuccio, Esq.	l.cappuccio@worldnet.att.net
Joseph V. Cavanagh, Jr., Esq.	stationfire@blishcavlaw.com
Edward M. Crane, Esq.	ecrane@skadden.com
Ronald J. Creamer, Esq.	resminilaw@yahoo.com
John R. Crockett, III, Esq.	jcrockett@fbtlaw.com
Brian Cunha, Esq.	Brian@Briancunha.com
Anthony F. DeMarco, Esq.	tdemarco@conversent.net
Marc DeSisto, Esq.	stationfire@desistolaw.com
Curtis R. Diedrich, Esq.	cdiedrich@sloanewalsh.com
Stefanie DiMaio-Larivee, Esq.	fonia@msn.com
Eric B. DiMario, Esq.	edimario@gunninglafazia.com
Mark P. Dolan, Esq.	ricedolank@aol.com
Esquire Deposition Services	stationfire@esquirecom.com
Christopher C. Fallon, Jr., Esq.	cfallon@cozen.com
John F. Flanagan, Esq.	jflanagan@torti.com
Willliam A. Filippo, Esq.	wfilippo@calvinolaw.com
Stephen P. Fogerty, Esq.	fogerty@halloran-sage.com
Mark Hadden, Esq.	mhadden@mhaddenlaw.com
Nancy W. Hamilton, Esq.	nhamilton@jw.com
Carl A. Henlein, Esq.	chenlein@fbtlaw.com
Eric Bradford Hermanson, Esq.	ehermanson@choate.com
Edward T. Hinchey, Esq.	Ehinchey@sloanewalsh.com
Daniel Horgan, Esq.	Horganlaw@snet.net
Stephen Izzi, Esq.	Stephen.izzi@hklaw.com
Patrick T. Jones, Esq.	pjones@cmj-law.com
Howard Julian	sohohomes@yahoo.com
Bruce P. Keller, Esq.	bkeller@debevoise.com
Fred A. Kelly, Jr., Esq.	StationFireLitigation@nixonpeabody.com
Joseph Krowski, Esq.	josephkrowski.law@verizon.net
Ronald Langlois, Esq.	rlanglois@smithbrink.com
James R. Lee, Esq.	jlee@riag.state.ri.us
S. Michael Levin, Esq.	mlevin@wszlaw.com
Thomas W. Lyons, Esq.	tlyons@straussfactor.com
Richard W. McAdams, Esq.	rmacadams@mandwlaw.com
Stephen J. MacGillivray, Esq.	smacgillivray@eapdlaw.com
David E. Maglio, Esq.	dmaglio@magliolaw.com
John R. Mahoney, Esq.	johnmahoney@amlawllp.com
Eva Marie Mancuso, Esq.	emancuso@hwac.com

Marks S. Mandell, Esq.	msb@msb-atty.com
Donald J. Maroney, Esq.	dmaroney@kkrs.com
Michael J. Mazurczak, Esq.	StationLitigation@melicklaw.com
Allen J. McCarthy, Esq.	StationLitigation@melicklaw.com
W. Thomas McGough, Jr., Esq.	tmcgough@reedsmith.com
Howard A. Merten, Esq.	hmerten.station@psh.com
Edwin F. McPherson, Esq.	emcpherson@m-klaw.com
Kelly N. Michels, Esq.	stationfire@hansoncurran.com
Steven A. Minicucci, Esq.	sminicucci@calvinolaw.com
David T. Mitrou, Esq.	dmitrou@mccormackfirm.com
Ralph J. Monaco, Esq.	rmonaco.c-l@snet.net
James T. Murphy, Esq.	stationfire@hansoncurran.com
John J. Nazzaro, Esq.	attynazzaro@aol.com
Robert T. Norton, Esq.	rnorton@sloanewalsh.com
Mark T. Nugent, Esq.	mnugent@morrisonmahoney.com
Suzanne O'Donoghue, Esq.	sodonoghue@hcc-law.com
J. Renn Olenn, Esq.	KBH@Olenn-Penza.com
Michael Potenza, Esq.	mpotenza@debevoise.com
Stephen M. Prignano, Esq.	sprignano@edwardsangell.com
Robert I. Reardon, Esq.	reardonlaw@aol.com
Kristin E. Rodgers, Esq.	stationfire@blishcavlaw.com
James A. Ruggieri	jruggieri@hcc-law.com
Michael A. St. Pierre, Esq.	pschneider@cmj-law.com
Deborah Solmor, Esq.	dsolmor@skadden.com
Ann Songer, Esq.	asonger@shb.com
Paul Sullivan, Esq.	pvsullivan@morrisonmahoney.com
Rajarma Suryanarayan	rsury@gunninglafazia.com
Mark R. Ter Molen	mtermolen@mayerbrownrowe.com
Mark D. Tourgee, Esq.	aminchillo@itwlaw.com
Andrew Trevelise	atrevelise@reedsmith.com
Scott T. Tucker, Esq.	stucker@ths-law.com
T. Dos Urbanski, Esq.	StationLitigation@melicklaw.com
Earl H. Walker, esq.	ewalker@jw.com
Susan S. Wettle, Esq.	swettle@fbtlaw.com
Lauren D. Wilkins, Esq.	lwilkins@smithbrink.com
Timothy A. Williamson, Esq.	aminchillo@itwlaw.com
Max Wistow, Esq.	mw@wistbar.com
George Wolf, III, Esq.	gwolf@shb.com
David Wollin, Esq.	dwollin@apslaw.com